

**PRIVACY POLICY**  
**Last Revised: November 18, 2020**

Your privacy is important to Jointly LLC (“Jointly”). This Privacy Policy describes how Jointly may collect, use, store, disclose, and process your personal information, through your access to or use of Jointly products and services, including those at <https://jointly.com/>, related websites, mobile software applications, and other offerings (collectively, the “Service”). By using these Services, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Services. Jointly may change this Privacy Policy from time to time by posting changes at this URL and may send notification emails. Your continued use of the Services following the posting of such changes will be deemed your acceptance of those changes. Please note that this Privacy Policy applies only to the Services, and not to any other third party website linked to or from it, or any third party website in which Jointly content or functionality is embedded. We do not control the privacy policies or practices of others.

**1. GENERAL**

(a) Consent. By accessing or using the Service, you consent to the collection, use, disclosure, storage and processing of your information in accordance with: (i) this Privacy Policy; (ii) the Terms of Service (<https://jointly.com/terms-of-service>), and any end user license agreement or services agreement, including any agreements between you and Jointly for specific services (collectively, “Service Terms”); and (iii) and as permitted or required by applicable law.

(b) International. Personal information collected by Jointly may be stored and processed in your region, in the United States, and in any other country where Jointly or its affiliates, subsidiaries, or service providers operate facilities. Those countries may have different data protection laws and regulations from those that apply in your home country. By accessing or using the Service, you consent to the transfer, storage and processing of your information outside of your home country. Please be aware that the governments, courts, and law enforcement, security or agencies of a particular jurisdiction may be able to obtain access to or disclosure of your information as permitted by the laws of that jurisdiction.

(c) Interpretation. For the purposes of this Privacy Policy, the words “such as,” “include,” “includes” and “including” shall be deemed to be followed by the words “without limitation.”

**2. HOW JOINTLY COLLECTS AND USES INFORMATION**

(a) Information That You Provide Directly. In general, Jointly receives and collects all information you provide via the Services, including through website input fields (including advertisements), phone, email (including email campaigns), web chat, or in other such ways. This includes personal information that can identify or relates to you, including but not limited to your first and last name, physical address, property description, email address, billing contact, payment account information (e.g., credit card and bank account information), telephone number, password, IP address and other information. Jointly may retain any messages you send through the Service, and Jointly may also retain other information you voluntarily provide to Jointly. Jointly use this information to operate, maintain and provide to you the features and functions of the Service, and as further described below. Jointly may also use your personal information to more effectively develop the Service and respond to your customer support needs. You have the choice on what information to share and the services you want to engage. You can choose not to provide information to us, but in general some information about you is required in order for you to access certain functionality of the Services, such as those mentioned above or for tracking your preferences, subscribing to a newsletter, or initiating other such actions.

(b) Information Collected or Received from Third Parties. Jointly also may periodically receive information about you and your property from affiliated entities, partners, third party business associates, other independent third-party sources, and publicly-available sources and will add it to our database of information. For example, we may receive information about your interaction with advertisements on third party websites, including updated physical addresses and demographic information. You should always review and, if necessary, adjust your privacy settings on third-party services by following the privacy setting or similar instructions set forth on such third-party services before linking or connecting them to the Service.

(c) Analytics information. Jointly may collect, measure and analyze traffic and usage trends for the Service, and Jointly may use third-party analytics tools to help Jointly (“Analytics Tools”). This allows Jointly to understand, among other things, who is using the Service, how they are using it, and ways to improve the Service. Analytics Tools may use cookies, log files, web beacons, device identifiers, advertising identifiers and similar tracking technologies to automatically collect and your preferences, performance data, and information about your web usage when you visit the Services. For example, we may collect information such as time of visit, pages visited, time spent on each page, IP address, device and Internet service provider information, Web browser details, the address of any referring website, and type of operating system used. Analytics Tools used by Jointly in connection with the Service may include but not be limited to:

Google Analytics

Jointly may use some or all of the Google Analytics Advertising features described at <https://support.google.com/analytics/topic/3413645>. For more information about the types of information that Google Analytics may collect and the ways in which that information may be used, please see <https://analytics.google.com/analytics/>.

Mixpanel

Jointly may use certain analytics products and services offered by Mixpanel. For more information about the types of information that Mixpanel may collect and the way in which that information may be used, please see <https://mixpanel.com/terms/>.

(d) Cookies. When you visit the Service, Jointly may send one or more cookies (small text files containing a string of alphanumeric characters) to your computer that uniquely identify your browser and enhance your navigation within the Service. A cookie may also convey information to Jointly about how you use the Service (e.g., the pages you view, the links you click and other actions you take), and allow Jointly or Jointly’s third-party business associates to track your usage of the Service. There are at least two different types of cookies: persistent and session cookies. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the Service. Persistent cookies can be removed by following your web browser’s directions for removal of cookies. A session cookie is temporary and is deleted after you close your browser. You can reset your web browser to refuse all cookies or to notify you when a cookie is being sent. However, some features of the Service may not function properly if cookies are disabled.

(e) Log File. Log file information is automatically reported by your browser each time you access a web page. When you access or use the Service, Jointly’s servers may automatically record certain log file information, such as your web request, internet protocol (IP) address, browser type, referring/exit pages and URLs, number of clicks and how you interact with links within the Service, domain names, landing pages, and pages viewed.

(f) Clear GIFs/Web Beacons. Clear GIFs (also known as web beacons) allow for the tracking of a user’s response to an email or usage of a website in a manner that does not reveal personal- information. Jointly may use clear GIFs or similar technologies to assess responses to emails and usage of the Service. For example, Jointly may use clear GIFs to track when emails are opened and which links are clicked by recipients. You can disable the ability of clear GIFs to capture information by blocking cookies.

(g) Device Identifiers. When you access or use the Service using a mobile device, Jointly may access, collect, monitor and/or remotely store one or more “device identifiers,” such as a universally unique identifier (“UUID”). Device identifiers are small data files or similar data structures stored on or associated with your device that uniquely identify your device. A device identifier may consist of data stored in connection with the device hardware, operating system or other software, or data sent to the device by Jointly. A device identifier may convey information to Jointly about how you browse and use the Service. A device identifier may remain persistently on your device to enhance your navigation within the Service. Some features of the Service may not function properly if use or availability of device identifiers is impaired or disabled.

(h) Advertising Identifiers. Advertising identifiers are unique strings associated with your mobile device that are provided by the operating system. Advertising identifiers may be modified or disabled by users in the device operating system's settings.

(i) Payment Processing. Jointly uses Stripe for payment, analytics and other business services. Stripe collects identifying information about the devices that connect to its services. Stripe uses this information to operate and improve the services it provides to Jointly, including for fraud detection. You can learn more about Stripe and read its privacy policy at <https://stripe.com/privacy>.

(j) Location Data. When you access or use the Service, Jointly may access, collect, monitor and/or remotely store "location data," which may include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your device. Location data may convey to Jointly information about how you browse and use the Service. Some features of the site, particularly location-based services, may not function properly if use or availability of location data is impaired or disabled.

(k) Commercial Communications. Jointly may use the information Jointly collects or receives to communicate directly with you. For example, Jointly may use the information to send you emails containing newsletters, promotions and special offers. Jointly may also use the information to send you service-related notices (e.g., account verification, technical and security notices).

(l) Use of Certain Service-Type Information. Jointly may use information from cookies, log files, device identifiers, location data and clear GIFs to: (i) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (ii) provide custom, personalized content or information; (iii) monitor the effectiveness of the Service; (iv) monitor aggregate metrics, such as total number of visitors, traffic and demographic patterns; (v) diagnose or fix technology problems; (vi) provide advertising to your browser or device; and (vii) conduct research or surveys.

(m) Use of Information with Your Consent. Jointly may use your information for any other purpose for which you provide consent.

(n) Account Login. If you have an account with the Service and log in while you access or use the Service, the information described above may be collected and maintained in a manner that associates such information with your name or contact information.

(o) Combining Information. Jointly may combine any of the information that Jointly collects from or about you, from one or multiple sources, and use it in the manner described in this Privacy Policy.

### **3. HOW JOINTLY MAY SHARE YOUR INFORMATION**

(a) Partners, Business Associates and Service Providers. Jointly shares your information with our partners, third-party business associates and vendors, contractors, agents and service providers that perform services on Jointly's behalf in connection with the Service. Jointly may also share information about you with any of Jointly's affiliates for purposes consistent with this Privacy Policy. Please note that our partners may contact you as necessary to obtain additional information about you, facilitate any use of the Services, fulfill orders, or respond to a request you submit. Jointly may also share information about you with your brokerage, your clients, other agents or brokerages, and other parties involved in a transaction including without limitation title and service companies.

(b) Third-party Vendors. Third-party vendors who provide product, services or functions on our behalf may include business analytics companies, customer service vendors, communications service vendors, marketing vendors, delivery, parcel, and transportation vendors, and security vendors. We may also authorize third-party vendors to collect information on our behalf, including as necessary to operate features of the Services, facilitate the delivery of orders, or provide online advertising tailored to your interests. Third-party vendors have access to and may collect personal information only as needed to perform their functions, may only use personal information consistent with this Privacy Policy and other appropriate confidentiality and security measures, and are not permitted to share or use the information for any other purpose.

(c) Syndication. Information regarding your property, including any descriptions, listing price, photos and other details, may be syndicated through the Multiple Listing Service (MLS) or other similar services.

(d) Business Change. If Jointly becomes involved in a merger, consolidation, acquisition, sale of assets, joint venture, securities offering, bankruptcy, reorganization, liquidation, dissolution or other transaction, or if the ownership of all or substantially all of Jointly's business otherwise changes, Jointly may share or transfer your information to a third party or parties in connection with such transaction or change in ownership, including as part of the due diligence process conducted by the parties to a potential transaction.

(e) Necessary Disclosure: Regardless of the choices you make regarding your information and to the extent permitted or required by applicable law, Jointly may disclose information about you to third parties to: (i) enforce or apply this Privacy Policy or the Service Terms; (ii) comply with laws, subpoenas, warrants, court orders, legal processes or requests of government or law enforcement officials (In such cases we reserve the right to raise or waive any legal objection or right available to us); (iii) protect Jointly's rights, reputation, safety or property, or that of Jointly's Service, customers, users or others; (iv) protect against legal liability; (v) establish or exercise Jointly's rights to defend against legal claims; or (vi) investigate, prevent or take action regarding known or suspected illegal activities; fraud; Jointly's rights, reputation, safety or property, or those of Jointly's customers, users or others; violation of the Service Terms; or as otherwise required by law.

(f) Sharing Information. Jointly may share certain service-type information, including information obtained through tools such as cookies, log files, device identifiers, location data and clear GIFs (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks) with Jointly's third-party business associates for the purposes described in the section titled "How Jointly Collects and Uses Information." Jointly may also aggregate or otherwise strip data of all personally-identifying characteristics and share that aggregated, anonymized data with third parties.

(g) Personal Information You Post in Public Areas. When you post a message in a Jointly forum, chat room, review, or customer feedback, the information you post may be accessible to other users of the Services and the public. If you post personal information anywhere on the Services that is accessible to other users or the public, you are advised that such personal information can be read, collected, used, or disseminated by others and could be used to send you unsolicited information or for other purposes. Accordingly, you assume full responsibility for posting such information and agree that Jointly is not responsible in any way for personal information you choose to post in these public areas.

(h) Aggregated Information. We may publish, share, distribute, or disclose personal information that has been aggregated with information from other users or otherwise de-identified in a manner that does not allow such data about you to be separated from the aggregate data and identified as originating from you, to third parties, including Jointly partners, sponsors, and advertisers. Such information may help Jointly identify and analyze training, demographic, and psychographic trends and information, and report to third parties how many people saw, visited, or clicked on certain content, areas of the Services, ads, or other materials. We may also use such data for research purposes.

**Special notice to Vermont Residents:** Jointly will not share your non-public personal information with unaffiliated third parties without your consent, other than as permitted by law.

#### **4. HOW JOINTLY STORES AND PROTECTS YOUR INFORMATION**

Personal information collected by Jointly may be stored and processed in your region, in the United States, and in any other country where Jointly or its affiliates, subsidiaries, or service providers operate facilities. Jointly will retain your information as long as necessary for the purposes outlined in this Privacy Policy and for a commercially reasonable time thereafter for backup, archival, fraud prevention or detection or audit purposes, or as otherwise required by law.

Jointly takes physical, technological and administrative measures to protect the personal information you provide through the Service against loss, theft, and unauthorized access, use, disclosure or modification. For example:

- we transmit data over secured communication channels using SSL Login credentials,
- all personal information is stored by trusted third party providers (e.g. AWS),
- all systems used to provide the Services are password protected, and
- all Services usage is restricted on a per-user basis on the principle of least privilege.

We rely on AWS' security programs to protect personal information while stored in their respective controlled facilities. For more information on AWS' security practices and processes, please see <https://aws.amazon.com/security/>.

Jointly complies with applicable data protection laws, including applicable security breach notification requirements.

Notwithstanding the foregoing, Jointly cannot ensure or warrant the security of any information you transmit to Jointly or guarantee that information within the Service will not be accessed, disclosed, altered or destroyed. Communications sent to or from the Service may not be secure. You should use caution whenever submitting information online and take special care in deciding what information you send to Jointly via email.

## 5. YOUR CHOICES ABOUT YOUR INFORMATION

(a) Controlling Your Settings. You can limit your browser or mobile device from providing certain information by adjusting the settings in the browser, operating system or device. Please consult the documentation for the applicable browser, operating system or device for the controls available to you. You can also stop receiving promotional emails from Jointly by following the unsubscribe instructions in those emails. Note that unsubscribe is not available for certain emails concerning your relationship or dealings with Jointly.

(b) Targeted Advertising. Jointly uses third-party audience data from Google Analytics such as age, gender and interests to gain a better understanding of its users and their interests. Jointly may also work with companies that collect information about your online activities to provide advertising targeted to your interests and preferences. For example, you may see certain ads within the Service or other websites or resources because Jointly uses services from Google and other similar companies to target our ads based upon information Jointly or such service providers have collected, including information that was collected through automated means (such as cookies and web beacons). These service providers also use automated technologies to collect information when you click on Jointly ads, which helps track and manage the effectiveness of Jointly's marketing efforts. You can learn more about targeted ads and your choices to prevent third parties from delivering targeted ads to your browser or device by visiting <https://adssettings.google.com/>, [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices) and <http://optout.aboutads.info/>. You should be aware that even if you opt out of targeted ads, you may still see ads within the Service, although the ads may not be tailored to your interests.

(c) Do Not Track. At this time, Jointly does not recognize "do not track" signals sent from web browsers. Third-party services that Jointly uses may collect personal information about individual users and their activities over time and across different websites. In some cases, you may be able to disable tracking mechanisms, but doing so may disable certain features of the Service. To disable tracking, please consult the documentation for your browser, operating system or device. For some devices, it may not be possible to disable tracking mechanisms. Certain Analytics Tools used by Jointly in connection with the Service may provide you with the means to opt out of certain forms of tracking, as discussed in the pages linked below.

Google Analytics

<https://tools.google.com/dlpage/gaoptout/>

Mixpanel

<https://mixpanel.com/optout>

To track opt-outs, Mixpanel uses a persistent opt-out cookie placed on users' devices. If you get a new device, install a new browser, erase or otherwise alter your browser's cookie file (including upgrading certain browsers), your Mixpanel opt-out cookie may be cleared, in which case you would need to repeat the Mixpanel opt-out process.

## **6. HOW LONG JOINTLY KEEP YOUR INFORMATION**

Jointly will retain your information as long as necessary for the purposes outlined in this Privacy Policy, and for a commercially reasonable time thereafter for backup, archival, fraud prevention or detection, or audit purposes, or as otherwise required by law.

## **7. ACCESSING AND UPDATING YOUR INFORMATION**

To the extent provided by the law of your jurisdiction, you may (i) have the right to access certain personal information we maintain about you and request details about how we process it, (ii) request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes, (iii) request that we update or correct inaccuracies in that information, (iv) object to our use of your personal information, (v) ask us to block or delete your personal information from our database, and (vi) request to download the information you have shared on the Services. You may make these requests and any other inquiries about this Privacy Policy by emailing [privacy@jointly.com](mailto:privacy@jointly.com) or calling us at (888) 610-6499. Any such requests are subject to the protection of other individuals' rights and applicable law. Additionally, to help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain

## **8. CHILDREN'S PRIVACY**

The Service is not directed to children, and you may not use the Service or provide any personal information to Jointly if you are under the age of 13 or if you are not old enough to consent to the processing of your personal information in your country.

## **9. THIRD-PARTY SERVICES AND SERVICES**

The Service may reference or provide links to other websites or resources. If you access any website or resources provided by a third party, this Privacy Policy will not apply. Your interactions with such websites and resources are subject to the privacy policies of the third parties that operate them. Please review those policies carefully to understand how those parties will treat your information.

## **10. YOUR CALIFORNIA PRIVACY RIGHTS**

Under California Civil Code Section 1798.83, if you are a California resident and your business relationship with Jointly is primarily for personal, family or household purposes, you may request certain data regarding Jointly's disclosure, if any, of personal information to third parties for the third parties' direct marketing purposes. To make such a request, please send an email to [privacy@jointly.com](mailto:privacy@jointly.com) with "Request for California Privacy Information" in the subject line. You may make such a request up to once per calendar year. If applicable, Jointly will provide to you via email a list of the categories of personal information disclosed to third parties for their direct marketing purposes during the immediately-preceding calendar year, along with the third parties' names and addresses. Please note that not all personal information sharing is covered by Section 1798.83's requirements.

## **11. UPDATES TO THIS PRIVACY POLICY**

Jointly may change this Privacy Policy from time to time by posting changes at this URL and may send notification emails, and the updated version of this Privacy Policy will be effective upon posting. Please check this page to review the most up-to-date version of this policy. Your continued use of the Services following the posting of such changes will be deemed your acceptance of those changes.

12. **HOW TO CONTACT US**

You can call us at (888) 610-6499, use the web form located at <https://jointly.com/support>, e-mail us at [privacy@jointly.com](mailto:privacy@jointly.com) or write to us at Jointly LLC, Attn: Privacy Dept., 4361 S Congress Ave, #101, Austin, TX 78745. Depending on where you are located, you may also have a right to complain to your local data protection regulator.